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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VOLKSWAGEN TIMING CHAIN
PRODUCT LIABILITY LITIGATION

Civil Action No. 16-2765 (JLL)(JAD)

NOTICE OF MOTION

To: All Counsel via ECF

COUNSEL:

PLEASE TAKE NOTICE that , pursuant to the Court's preliminary approval Order entered on June 14, 2018, on November 19, 2018 at 11:00 a.m., Plaintiffs Lloyd Artola, Dawn Stanton Blanchard, Katrina Calihan, Hazma Deib, Umar Ellahie, Angel Esquijarosa, Allison Fleck, William Fleck, Allan Gaudet, Zachariah Gossman, Jason Hosier, Demetrie Hylick, Garrett Johnson, Pamela K. Kane, Hannah LeMoine, Shimelesse Mekbeb, Neel Mody, Karl Molwitz, Anoushirvan Nadiri, Suzanne Noyes, Debra J. Oles, Jeffrey Pipe, Jennifer Piumarta, John Schaffranek, Erika Sensnovis, Robby Smith, Michael Spencer, Dena Stockalper,

William R. Swihart, David Zhao, Bartosz Zielezinski, and David Zimand (collectively, “Plaintiffs”) will respectfully move the Court for an Order certifying the Settlement Class; granting final approval of the Settlement; awarding incentive payments to Plaintiffs; and granting Plaintiffs’ request for attorneys’ fees and reimbursement of expenses.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs will rely upon the accompanying Memorandum of Law and the Declaration of James E. Cecchi, with exhibits thereto.

PLEASE TAKE FURTHER NOTICE THAT Defendants Volkswagen of America, Inc., Volkswagen AG and Audi AG do not oppose Plaintiffs’ requested relief.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Federal Rules of Civil Procedure, a proposed form of Order is attached.

Dated: September 27, 2018

Respectfully submitted

**CARELLA, BYRNE, CECCHI,
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/s/ James E. Cecchi

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Plaintiffs' Executive Committee

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September, 2018, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's electronic filing system (CM/ECF) upon all counsel of record.

s/ James E. Cecchi

James E. Cecchi